



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 18, 2007

BY FAX

USDS SDNY
DOCUMENT
ELECTRONICALLY FILE
DOC #: _____
DATE FILED: DEC 19 2007

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Wanda Vasquez
07 Cr. 352 (PAC)

Dear Judge Crotty:

~~X~~ I write to request a four week adjournment of the plea currently scheduled for December 20, 2007, and also to request the exclusion of time until a control date of January 31, 2008. As the Court knows, the parties are in the final stages of completing a plea agreement. After a meeting on December 12, 2007 with the defendant and his counsel, I expect that my office will be in a position to approve a final agreement shortly, but not before the December 20, 2007 date. Therefore, the parties jointly request an adjournment until January.

The Government also requests that the Court exclude time until January 31, 2008. The Government submits that such exclusion is warranted pursuant to 18 U.S.C. § 8161(h)(8)(A). Specifically, the ends of justice outweigh the best interest of the public and the defendant in a speedy trial because it affords the defendant and the Government to continue and complete their ongoing discussions concerning the facts of the case and a potential disposition in the case. These activities are necessary to ensure the effective assistance of counsel.

Mark Cohen, counsel for the defendant, told me by

MEMO ENDORSED

MEMO ENDORSED

The Honorable Paul A. Crotty
December 18, 2007
Page 2

telephone yesterday that he consents to the adjournment of the conference and the exclusion of time.

Very truly yours,

MICHAEL J. GARCIA
United States Attorney

By: William J. Harrington
William J. Harrington
Assistant United States Attorney
212-637-2331

cc: Mark Cohen
Counsel for the defendant
(By fax: 212 293 7224)

Application GRANTED. The conference is adjourned to 2/15/08 at 3:45 PM in Courtroom 202. It is further ordered pursuant to 18 U.S.C. 3161 (b) (8) (A), the time from 12/20/07 until 2/15/08 is excluded in the interest of justice. I find that this exclusion outweighs the best interest of the defendant and the public is a speedy trial. So Ordered.

SO ORDERED: 12-19-07

Paul A. Crotty
HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE